

Serial No. 09/664,479
Art Unit No. 2684

REMARKS

Claims 1-2 and 9-12 are pending in the patent application. The Examiner has rejected Claims 1-2 and 9-12 under 35 USC 103 as unpatentable over the teachings of Snelling in view of Kung. By this amendment, Applicants have amended the language of independent Claim 1. For the reasons set forth below, Applicants respectfully assert that all of the pending claims are patentable over the cited prior art.

Applicants first want to point out two errors in the most recent Office Action dated February 11, 2004. The Office Action Summary sheet correctly indicates that the Office Action is non-final. Applicants contend, and the Examiner has acknowledged, that issuance of a Final Office Action would not be an appropriate response to the RCE and Amendment that Applicants had filed on December 4, 2003. The Amendment which accompanied the RCE amended the language of the only remaining independent claim (Claim 1) and added four new claims to the application. However, the **Response to Amendment** section of the Examiner's Detailed Action dated February 11, 2004 includes the first two paragraphs from the

YOR920000632

-8-

Serial No. 09/664,479
Art Unit No. 2684

previous Office Action indicating that the Office Action was a Final Office Action. Applicants request that the Examiner confirm in writing that the Office Action dated February 11, 2004 was a non-final Office Action.

Applicants also note that the language of Claim 11 has not been expressly rejected. While the Examiner has listed Claim 11 with Claim 1 in paragraph 4 which begins on page 2 of the detailed action, the cited art is not applied to the language of Claim 11. Clarification of the rejection of Claim 11 is requested.

The present application teaches and claims a network node device for automatically, dynamically, and selectively connecting one or more telephone wirelines to one or more wireless connections, with the aim of providing dynamic selective bridging of both incoming and outgoing calls to and from wireless devices based on unique identifying information, including privacy policies associated with the wireless devices to which the wireless connections are being made. The invention includes one or more connections to one or more telephone wirelines; one or more wireless signal generators supporting one or more wireless connections; at least one storage location for storing unique information

YOR920000632

-9-

Serial No. 09/664,479
Art Unit No. 2684

for each of a plurality of wireless devices; a processor for accessing the storage location and for generating call processing signals based on the stored unique information; an interconnection switch that makes and breaks one or more interconnections between the telephone wirelines and the respective wireless signal generators to connect one or more incoming calls to one or more of the plurality of wireless devices in response to the call processing signals; and a bridge that dynamically bridges signals from multiple wireless connections to one or more of the telephone wirelines for outgoing calls from one or more of the wireless devices in response to call processing signals generated by the processor based on stored unique information (Claim 1). The language of Claim 1 has been amended to recite the processor, as detailed on page 15 of the original Specification, and its role in generating call processing signals based on stored unique information in order to establish connections for both incoming and outgoing calls. The network node device may further include a verifier that verifies the validity of a request from a wireless device through a wireless connection for the bridging of signals (Claim 2), and may further be adapted to

YOR920000632

-10-

Serial No. 09/664,479
Art Unit No. 2684

dynamically and selectively bridge signals from wireless devices based on both unique identifier and unique service information (Claims 9 and 10), and the bridge may be adapted to alter bridging of signals dynamically, during use after a wireless connection has already been made (Claim 11) or may deny bridging (Claim 12).

Under the present invention, while multiple devices may share a telephone number, and the associated single wireline, the invention allows selective connection across the different devices based on the unique information associated with the devices, such that multiple incoming and/or outgoing calls can be connected between multiple different wireless devices and the wirelines even if the wireless devices share the same telephone number. Applicants respectfully assert that the Snelling patent, alone or in combination with the teachings of Kung, does not teach or suggest the invention as claimed.

The Snelling system is a single residence system which includes an NCU, 650, for interfacing to a number of PSTN lines and for rendering signals input on those lines compatible for delivery to the CAB module, 660. The CAB module is preprogrammed to connect signals from each PSTN

YOR920000632

-11-

Serial No. 09/664,479
Art Unit No. 2684

line to a preset combination of devices (see: Col. 2, lines 24-34 and Col. 5, lines 25 et seq). Applicants point out that each line is associated with a preset combination of devices; so that dynamic connecting is not possible in Snelling.

As shown in Fig. 3A, the Snelling CAB is connected to the radio multiplex engine 670 which performs the RF transmission to the handsets and WAUs specified by the CAB. The CAB/bridge of the Snelling system is preprogrammed with fixed assignments of signals from certain wirelines to certain devices. The Snelling patent has multiple wirelines, and therefore multiple different telephone numbers being fixedly associated with certain devices in the residence. Snelling does not teach or suggest the dynamic and selective bridging of signals incoming to a single telephone number and wireline to one or more than one device. Rather, Snelling establishes connections between preset pairs or sets of wirelines and devices based on predetermined mapping among the fixed wirelines to devices, wherein each device has a different telephone number.

With regard to Claim 2, Applicants note that that the Snelling patent teaches, at the cited passage found in Col.

YOR920000632

-12-

Serial No. 09/664,479
Art Unit No. 2684

13, lines 56-64, that the NCU handles remote unit registration and authentication. Applicants respectfully assert that the functionality of the NCU which is detailed in the cited Snelling passage is not verifying the validity of a request from a wireless device through a wireless connection for the bridging of signals. Rather, the NCU registers the "remote" units within the single residence prior to use, as is expressly stated in Col. 2, lines 24-34, in accordance with programming for coupling signals to predetermined combinations of devices in the residence.

The Examiner has additionally cited the Kung patent as disclosing dynamic and selective bridging and user privacy input. Applicants respectfully disagree. The Kung patent is directed to queuing multiple calls to a subscriber. The calls are all to the same subscriber and are placed in a waiting call queue from which the subscriber can access the calls. Applicants assert that the placing of calls in a FIFO queue does not amount to dynamic and selective bridging based on stored unique information for wireless devices. Furthermore, the cited teachings regarding intercom services, which include extension transfer, call conferencing and internal caller ID, relate to subscriber

YOR920000632

-13-

Serial No. 09/664,479
Art Unit No. 2684

selection of calls and call features, but do not relate to selective dynamic bridging by a bridge based on stored unique device information.

Applicants respectfully assert that the combination of Snelling and Kung would not render the claimed invention obvious. Even if one were to combine the teachings, the result would be a Snelling system with preprogrammed fixed assignments of signals from certain wirelines to certain devices and wherein signals would be queued for delivery to the assigned device. Applicants contend that one would not be motivated by Kung to change the fixed assignment of wirelines to devices. Moreover, even if Kung provided such a suggestion to modify Snelling, wherein queued signals could be de-queued for dynamic bridging to an intended device, the de-queuing of queued signals would still be based on subscriber selection and would not result in the claimed invention with its automatic, selective, dynamic bridging based on stored unique device information.

Applicants note that the Examiner had not responded to Applicants' arguments which were presented in the previous Amendment. As discussed above, the *Response to Arguments* section was simply copied into the Office Action from the

YOR920000632

-14-

Serial No. 09/664,479
Art Unit No. 2684

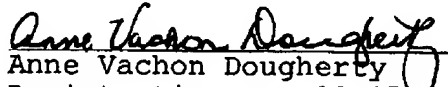
previous Action. In addition, Applicants herein augment those arguments based on the amended language of Claim 1. Applicants respectfully request that the Examiner consider the amended claim language and arguments and provide a detailed response, in the form of a non-final Office Action. Applicants request the detailed response so that Applicants can fully understand how the cited art is being applied to the claim language and can have some guidance, as to whether the Examiner believes that the amendments and arguments distinguish the cited art from the claimed invention, in order to proceed with prosecution of the application.

Based on the foregoing amendments and remarks, Applicants respectfully request entry of the amendments, reconsideration of the amended claim language in light of the remarks, withdrawal of the rejections, and allowance of the claims.

Respectfully submitted,

R. E. Chapman

By:


Anne Vachon Dougherty
Registration No. 30,374
Tel. (914) 962-5910

YOR920000632

-15-